

**EXHIBIT 1**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BAYOU STEEL BD HOLDINGS, L.L.C., *et al.*,<sup>1</sup>  
  
Debtors.

CHARLES ZIEGELER AND RONNIE  
MILLET, individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

BAYOU STEEL BD HOLDINGS, L.L.C. *d/b/a*  
BAYOU STEEL GROUP, BD BAYOU STEEL  
INVESTMENT, LLC, BD LAPLACE, LLC,  
BAYOU STEEL BD HOLDINGS II, L.L.C., and  
BLACK DIAMOND CAPITAL  
MANAGEMENT, LLC,

Defendants.

Chapter 11

Case No. 19-12153 (KBO)  
  
(Jointly Administered)

Adv. Pro. No. 19-50748 (KBO)

**ORDER APPROVING STIPULATION EXTENDING THE TIME TO ANSWER OR  
OTHERWISE RESPOND TO THE COMPLAINT**

Upon consideration of the Stipulation (the “**Stipulation**”) between counsel to Charles Ziegeler and Ronnie Millet, individually and on behalf of all others similarly situated (the “**Plaintiffs**”), and counsel for Bayou Steel BD Holdings, L.L.C., BD Bayou Steel Investment, LLC, and BD LaPlace, LLC (together, the “**Debtors**”), Bayou Steel BD Holdings II, L.L.C. and Black Diamond Capital Management, LLC (together with the Debtors, collectively,

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are Bayou Steel BD Holdings, L.L.C., a Delaware limited liability company (1984), BD Bayou Steel Investment, LLC, a Delaware limited liability company (1222), and BD LaPlace, LLC, a Delaware limited liability company (5783). The location of the Debtors’ mailing address is 138 Highway 3217, LaPlace, Louisiana 70068.

the “**Defendants**”), a copy of which is attached hereto as Exhibit A,<sup>2</sup> and after due deliberation and sufficient cause appearing therefore, it is hereby

ORDERED that the Stipulation and all of the terms set forth therein are APPROVED and shall have the full force and effect of an order entered by the Court with respect thereto; and it is further

ORDERED that this Court retains jurisdiction to interpret, implement and enforce the provisions of this Order and the Stipulation.

Dated: \_\_\_\_\_, 2019

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The Honorable Karen B. Owens  
United States Bankruptcy Judge

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<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Stipulation.

**EXHIBIT A**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BAYOU STEEL BD HOLDINGS, L.L.C., *et al.*,<sup>1</sup>  
  
Debtors.

CHARLES ZIEGELER AND RONNIE  
MILLET, individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

BAYOU STEEL BD HOLDINGS, L.L.C. *d/b/a*  
BAYOU STEEL GROUP, BD BAYOU STEEL  
INVESTMENT, LLC, BD LAPLACE, LLC,  
BAYOU STEEL BD HOLDINGS II, L.L.C., and  
BLACK DIAMOND CAPITAL  
MANAGEMENT, LLC,

Defendants.

Chapter 11

Case No. 19-12153 (KBO)  
(Jointly Administered)

Adv. Pro. No. 19-50748 (KBO)

**STIPULATION EXTENDING THE TIME TO ANSWER OR  
OTHERWISE RESPOND TO THE COMPLAINT**

Counsel for Bayou Steel BD Holdings, L.L.C., BD Bayou Steel Investment, LLC, and BD LaPlace, LLC (together, the “**Debtors**”), Bayou Steel BD Holdings II, L.L.C. and Black Diamond Capital Management, LLC (together with the Debtors, collectively, the “**Defendants**”) and counsel to Charles Ziegeler and Ronnie Millet, individually and on behalf of all others similarly situated (the “**Plaintiffs**”, and together with the Defendants, the “**Parties**”), hereby agree and stipulate based on the following:

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are Bayou Steel BD Holdings, L.L.C., a Delaware limited liability company (1984), BD Bayou Steel Investment, LLC, a Delaware limited liability company (1222), and BD LaPlace, LLC, a Delaware limited liability company (5783). The location of the Debtors’ mailing address is 138 Highway 3217, LaPlace, Louisiana 70068.

WHEREAS, the Plaintiffs filed the *Class Action Adversary Proceeding Complaint* on October 30, 2019 (the “**Complaint**”);

WHEREAS, Defendants’ current response deadline is December 2, 2019;

WHEREAS, counsel to the Plaintiffs agrees to extend the time for the Defendants to answer or otherwise respond to the Complaint through and including December 16, 2019;

NOW THEREFORE, in consideration of the premises and mutual covenants contained herein and other valuable consideration, the receipt of which is hereby acknowledged, it is stipulated and agreed by and between the Parties, as follows:

1. The Defendants’ time to answer or otherwise respond is extended through and including December 16, 2019.

2. This extension is without prejudice to the rights of any Party, including the right to agree to further extensions of time for the filing of the answer, or to the rights of the Defendants to seek further extensions of time from the Court to answer, or otherwise respond to the Complaint, and the Plaintiffs’ rights to oppose any such requests by the Defendants.

WOMBLE BOND DICKINSON (US) LLP

POLSINELLI PC

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*Counsel for the Debtors and Debtors in Possession*

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*/s/ Seth A. Niederman*

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*Counsel to Black Diamond Capital  
Management, LLC*